

I was going to email  
a message but  
thought this would be  
the best way to  
state that I concur  
with the recommendations  
proposed by AWI to  
strengthen USDA's  
proposed definitions for  
"USDA Verified" claims →

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Thank you-

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## Buyer Beware

### Comments to USDA Critical

An increasing amount of meat is marketed with claims such as “free-range” and “antibiotic-free.” The U.S. Department of Agriculture (USDA) is currently seeking public comment on proposed definitions for “USDA Verified” claims. Clear and meaningful language will provide consumers with important information about how animals are raised. Below, in bold type, are USDA’s proposed claims followed by AWI’s recommendation of how USDA must strengthen their definitions and remove potential loopholes that would be exploited by industry. Please write to USDA by March 31, 2003 requesting these changes.

- **“No subtherapeutic antibiotics added” or “Not fed antibiotics”**

Animals can receive antibiotics by means other than feed. USDA must alter the second phrase to read: “Not administered antibiotics.” USDA’s proposed definition for these phrases includes the statement, “Livestock are not fed subtherapeutic levels of antibiotics.” USDA should change the definition to read: “Livestock do not receive subtherapeutic levels of antibiotics.”

- **“Free Range, Free Roaming or Pasture Raised”**

USDA’s definition for this phrase regarding the environment provided to cattle, sheep and swine is loophole-ridden. It should be re-defined to require that: 1) “Each individual animal shall have continuous, unconfined and unobstructed access to pasture throughout their life;” 2) “Pasture” include: “Vegetative cover and environment appropriate to the species in terms of diet and natural behavior;” and 3) “Animal density must be restricted so that animals can fulfill normal patterns of behavior and so that healthy pasture or range is maintained.”

- **“Grass fed”**

USDA’s proposed language would allow farmers confining animals in feedlots to make a “grass-fed” claim. USDA must require that: Animals have had continuous, unconfined and unobstructed access to grass (including legumes and forbs) pastures throughout their life. When free-standing forage is unavailable during the winter season cattle will continue to be fed an 85% forage derived diet.

The address for USDA is: Chief, Standardization Branch, Livestock and Seed Program, AMS, USDA, Room 2603-S, Stop 0254, 1400 Independence Avenue, SW, Washington, DC 20250-0254. Comments can also be emailed to [marketingclaim@usda.gov](mailto:marketingclaim@usda.gov). Refer to Docket No. LS-02-02. Comments submitted by AWI to USDA can be viewed at [www.awionline.org/farm](http://www.awionline.org/farm). 🐾